

### **REMARKS/ARGUMENTS**

The office action of June 15, 2009 has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 1-16, 18-20, 22 and 23 remain in this application. Claim 6 has been amended to fix a clerical error. No new matter has been added. Applicants respectfully submit that the amendment to claim 6 does not raise new issues or require a new search.

#### **Rejections under 35 U.S.C. § 112**

Claim 6 stands rejected as being indefinite under 35 U.S.C. § 112, second paragraph. More particularly, the Action contends that there is insufficient antecedent basis for “the apparatus” as recited. Applicants corrected the clerical error to address the rejection. Accordingly, Applicants respectfully request that the rejection be withdrawn.

#### **Rejections under 35 U.S.C. § 103**

Claims 1-11 and 18-23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. publication no. 2002/0143961 A1 to Siegel et al. (“Siegel”) in view of U.S. patent no. 6,434,700 B1 to Alonso et al. (“Alonso”) and further in view of U.S. publication no. 2003/0065662 to Cosic (“Cosic”). Applicants respectfully traverse this rejection.

Claim 1 recites, *inter alia*,

a device comprising: a first plurality of databases and interfaces for managing and centrally controlling the access, from any of the remote entities to the first plurality of databases and to a second plurality of databases, the interfaces comprising: a plurality of adapters configured to allow access to the first and second plurality of databases, each adapter being able to manage a corresponding database typology.

The Action concedes that Siegel and Alonso, either alone or in combination, fail to disclose such features, but instead relies on Cosic to describe such features. More particularly, the Action cites paragraphs [0012] and [0014] of Cosic. However, as discussed in paragraph [0014], Cosic is directed toward a UDMI that includes a processing system to connect multiple standard database management systems and to allow multiple users to access, manage, and manipulate data within each of the standard database management systems. Indeed, such a description is devoid of any

discussion of *adapters*, much less *a plurality of adapters* configured to allow access to the first and second plurality of databases, *each adapter* being able to manage a *corresponding* database typology as recited in claim 1.

Moreover, Cosic fails to disclose such features anywhere in the disclosure. For example, paragraph [0090] of Cosic describes that the UDMI utilizes one interface to connect to each of the standard DBMSs. Even assuming, but not conceding, that a Database Interface (DBI) constitutes an adapter, Cosic, at best discloses only one DBI, and hence, only *one universal adapter* for connecting to all standard DBMSs. Significantly, Cosic fails to describe a plurality of adapters, let alone wherein *each adapter is able to manage a corresponding database typology* as recited in claim 1. Thus, Cosic fails to cure the deficiencies of Siegel and Alonso. Therefore, even assuming, but not conceding that a combination of Siegel, Alonso and Cosic would have been proper, such a combination would have failed to result in each and every feature of claim 1.

Claims 18 and 22 recite features similar to those discussed above with respect to claim 1. As such, claims 18 and 22 are patentably distinct from a combination of Siegel, Alonso and Cosic for substantially the same reasons as discussed above.

Claims 2-11, 19-20 and 23 ultimately depend on claims 1 and 18, respectively. Therefore, dependent claims 2-11, 19-20 and 23 are patentably distinct from a combination of Siegel, Alonso and Cosic for at least the same reasons as claims 1 and 18 in addition to the advantageous features recited therein.

Claims 12-17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over the combination of Siegel, Alonso and Cosic, and further in view of U.S. publication no. 2001/0016880 A1 to Cai et al. ("Cai"). Applicants respectfully traverse this rejection.

Claims 12-16 ultimately depend on claim 1. With respect to claim 1, Cai fails to cure the deficiencies of Siegel, Alonso and Cosic. As such, even assuming but not conceding that a combination of Siegel, Alonso, Cosic and Cai would have been appropriate, such a combination would not have resulted in each and every feature of claims 12-16. Accordingly, claims 12-16 are patentably distinct from a combination of Siegel, Alonso, Cosic and Cai. Claim 17 was previously canceled without prejudice or disclaimer.

**CONCLUSION**

If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, Applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same.

Respectfully submitted,  
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Dated: September 10, 2009

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